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CONSUMER PROTECTION

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Direct: 949.622.2441

March 31, 2022

VIA EMAIL

Attorney General John M. Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
Email: DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General Formella:

We represent Tangible Solutions, Inc., a North Carolina based electronic records management company, in a recent data security incident. This letter is sent on Tangible Solution's behalf because personal information belonging to New Hampshire residents may have been affected.

1. Nature of the Security Incident

On October 24, 2021, Tangible Solutions discovered that cybercriminals claimed to have accessed certain systems in our environment. In response, Tangible Solutions took immediate steps to secure its systems and engaged an independent digital forensics and incident response firm to determine what happened and if any personal information had been accessed or acquired without authorization because of the incident.

On January 31, 2022, Tangible Solutions learned that certain files belonging to three, third-party providers that store certain of their data with Tangible Solutions, were acquired without authorization.

On March 1, 2022, these third-party providers permitted Tangible Solutions to assess the acquired files to determine their specific contents and to notify any of their customers of this event as appropriate.

On March 15, 2022, Tangible Solutions determined that certain personal information warranting notification (social security numbers) of New Hampshire residents was included in these files. Tangible Solutions notified the New Hampshire residents on March 31, 2022.

2. Number of New Hampshire Residents Affected

Approximately twelve (12) residents of New Hampshire may have been affected by this incident. Tangible Solutions will notify the potentially affected New Hampshire residents on or about March 31, 2022, via U.S. mail. A sample copy of the notification letter is being provided with this correspondence.

3. Steps Taken Relating to the Incident

Tangible Solutions has implemented additional safeguards to improve data security in its environment, including implementing 24/7 monitoring of its endpoint detection and response tool. Tangible Solutions is also offering identity theft protection services for twelve (12) months through IDX to provide affected persons with complimentary credit monitoring. IDX also created a call center to answer any questions from affected persons regarding the incident.

4. Contact Information

Tangible Solutions remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact me at 949.622.2441 or by e-mail at kamran.salour@troutman.com.

Please let me know if you have any questions

Sincerely,



Kamran Salour
Partner



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
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<<Address 5>>
<<City>><<State>><<Zip>>
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RE: Notice of Data Security Incident

Dear <<Name 1>>:

At Tangible Solutions, Inc., we are committed to protecting the confidentiality and security of the information we receive and maintain. We are writing to inform you of a recent data security incident we experienced that may have involved some of your information. We are writing to notify you of the incident and inform you about steps you can take to help protect your personal information.

What Happened: On October 24, 2021, Tangible Solutions learned of a security incident that resulted in unauthorized access to our digital environment. Upon discovering this unauthorized activity, we immediately secured our digital environment and began to investigate. We also engaged a leading computer forensic firm and cybersecurity experts to conduct an investigation to determine what happened. The investigation revealed that an unauthorized party accessed certain files and data stored on a single Tangible Solutions' server.

What Information Was Involved: Tangible Solutions completed a comprehensive review of the data that could have potentially been accessed by the unauthorized party and, on March 21, 2022, determined that information included your: first and last name, address, and Social Security number.

What We Are Doing: We are cooperating with law enforcement and have independently and electively engaged cybersecurity experts to conduct an investigation of our own. To prevent something like this from happening again, we are implementing additional technical security measures and increasing employee screening and training. We are providing you with information about steps that you can take to help protect your personal information. We are also offering complimentary identity protection services through Experian that includes 12 months of credit monitoring.

What You Can Do: For more information on how you can protect your personal information, please review the resources provided on the following pages.

For More Information: If you have any questions regarding the incident or would like assistance with enrolling in the services offered, please call 855-604-1844 Monday through Friday between 9 a.m. to 9 p.m. Eastern Time.

The security of your information is a top priority for Tangible Solutions. We take your trust in us and this matter very seriously and we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Tony Tangible

Tony Tangible
President & CEO
Tangible Solutions

Additional Steps You Can Take to Further Protect Your Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Ave, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.consumer.ftc.gov, www.ftc.gov/idtheft.

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

- *Equifax*, P.O. Box 740241, Atlanta, GA 30374, 1-800-525-6285, www.equifax.com.
- *Experian*, P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, www.experian.com.
- *TransUnion*, P.O. Box 1000, Chester, PA 19016, 1-800-916-8800, www.transunion.com.

Fraud Alerts: There are two kinds of general fraud alerts you can place on your credit report—an initial alert and an extended alert. You may want to consider placing either or both fraud alerts on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and provide the appropriate documentary proof. An extended fraud alert is also free and will stay on your credit report for seven years. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Military members may also place an Active-Duty Military Fraud Alert on their credit reports while deployed. An Active-Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment.

Credit or Security Freezes: Under U.S. law, you have the right to put a credit freeze, also known as a security freeze, on your credit file, for up to one year at no cost. The freeze will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit.

How do I place a freeze on my credit reports? You must separately place a security freeze on your credit file with each credit reporting agency. There is no fee to place or lift a security freeze. For information and instructions on how to place a security freeze, contact each of the credit reporting agencies identified above. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement. After receiving your freeze request, each credit bureau will provide you with a unique PIN or password. Keep the PIN or password in a safe place as you will need it if you choose to lift the freeze.

How do I lift a freeze from my credit reports? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or via phone, a credit bureau must lift the credit freeze within an hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after receiving your request.

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include the right to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fera.pdf or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

Additional Information for residents of the following states: You can obtain information for the offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take to prevent identity theft.

- **California Residents:** Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.
- **Colorado:** You may contact and obtain information from your state attorney general at: Colorado Attorney General's Office, Consumer Protection, 1300 Broadway, 9th Floor, Denver, CO 80203; 1-720-508-6000; www.coag.gov.
- **Illinois:** You may contact and obtain information from your state attorney general at: 100 West Randolph Street, Chicago, IL 60601; 1-866-999-5630; www.illinoisattorneygeneral.gov.
- **Maryland:** You may contact and obtain information from your state attorney general at: 200 Saint Paul St, Baltimore, MD 21202; (410) 576-6350; www.marylandattorneygeneral.gov.
- **North Carolina:** You may contact and obtain information from your state attorney general at: North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699; 1-919-716-6000 / 1-877-566-7226; www.ncdoj.gov.

- **New York:** For more information about preventing identity theft, you can visit New York Department of State Division of Consumer Protection: <http://www.dos.ny.gov/consumerprotection> or at:
 - New York State Division of Consumer Protection 123 William Street New York, NY 10038-38041 (800) 697-1220;
 - One Commerce Plaza 99 Washington Ave. Albany, NY 12231-0001
- **Washington DC:** You may contact and obtain information from your state attorney general at: Washington DC's Attorney General's Office, 441 4th St NW, Washington, DC 20001; (202) 727-3400; www.oag.dc.gov.
- **All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580; www.consumer.gov/idtheft; 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.
- **Obtaining a Free Credit Report:** You may obtain a free copy of your credit report once every 12 months by visiting www.annualcreditreport.com, calling toll-free 877-322-8228 or by completing an Annual Credit Request Form at: www.ftc.gov/bcp/menus/consumer/credit/rights.shtml and mailing to: Annual Credit Report Request Service, P.O. Box 1025281, Atlanta, GA 30348-5283.



Enter your Activation Code: <<ACTIVATION CODE>>
Enrollment Deadline: <<Enrollment Deadline>>

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate

Enter your unique Activation Code of <<ACTIVATION CODE>>, then click "Submit" and follow these 4 steps:

1. **Register:**
Complete the form with your contact information and click "Continue".
If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.
 2. **Create Account:**
Enter your email address, create a password, and accept the terms of use.
 3. **Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
 4. **Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click 'Sign Me Up' to finish enrolling.
- You're done!**
The confirmation page shows your completed enrollment.
Click "View My Product" to access the product features.

¹ WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

² The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

³ Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com.

⁴ The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.